

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

LORDSTOWN MOTORS CORP., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Related to Docket Nos. 234, 294, and 675

**SECOND SUPPLEMENTAL DECLARATION OF DEBORAH KOVSKY-APAP
IN SUPPORT OF APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING
THE EMPLOYMENT AND RETENTION OF TROUTMAN PEPPER HAMILTON
SANDERS LLP AS COUNSEL TO THE OFFICIAL COMMITTEE
OF UNSECURED CREDITORS EFFECTIVE AS OF JULY 17, 2023**

I, Deborah Kovsky-Apap, under penalty of perjury, state as follows:

1. I am a partner at the law firm of Troutman Pepper Hamilton Sanders LLP (“Troutman Pepper”), which maintains offices at, among other locations, 875 Third Avenue, New York, New York 10022. I am a member in good standing of the Bars of the States of New York, New Jersey and Michigan and I have been admitted to practice in each of those states. I am also admitted *pro hac vice* in the above-captioned cases. There are no disciplinary proceedings pending against me.

2. I submit this declaration (the “Second Supplemental Declaration”) to supplement (i) my declaration, dated August 7, 2023, attached as Exhibit A to the *Application for Entry of an Order Authorizing the Employment and Retention of Troutman Pepper Hamilton Sanders LLP as Counsel to the Official Committee of Unsecured Creditors Effective as of July 17, 2023* [Docket

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

No. 234] (the “Application”)² and (ii) the *First Supplemental Declaration of Deborah Kovsky-Apap in Support of Application for Entry of an Order Authorizing the Employment and Retention of Troutman Pepper Hamilton Sanders LLP as Counsel to the Official Committee of Unsecured Creditors Effective as of July 17, 2023* [Docket No. 675] (the “First Supplemental Declaration”).

This Second Supplemental Declaration is intended to supplement the declaration appended to the Application and the First Supplemental Declaration, and in no way replaces anything set forth in the Application, its appended declaration, or the First Supplemental Declaration.

3. Except as otherwise indicated, I have personal knowledge of the matters set forth herein.

4. Troutman Pepper conducted, and continues to conduct, searches into its relationships with the Debtors, their creditors and other parties in interest in these chapter 11 cases. In connection with this continued search, Troutman Pepper hereby discloses the following search:

Name	Relationship to Debtors	Relationship to Troutman Pepper
CapSpecialty	Excess Insurance Policy Providers	CapSpecialty is a current client of Troutman Pepper

5. Troutman Pepper very recently learned that CapSpecialty, which provided an excess insurance policy to the Debtors, is being represented by Troutman Pepper attorneys. CapSpecialty was not previously identified by the Debtors as a potential party in interest. Troutman’s representation of CapSpecialty may involve issues related to the Debtors’ insurance coverage. An ethical screen has been established and no Troutman personnel engaged on behalf

² Capitalized terms used but not defined herein are ascribed the definitions given to them in the Application. By this Second Supplemental Declaration, Troutman Pepper does not waive the First Supplemental Declaration or the Application and its contents and appended exhibits, and hereby reserves and preserves all privileges.

of CapSpecialty will take part in the representation of the Committee. Should a direct conflict arise, the Troutman Committee counsel will engage conflicts counsel to deal with such issues.

6. Should any additional information relevant to Troutman Pepper's retention and employment in the above-captioned cases come to Troutman Pepper's attention, Troutman Pepper will file additional supplemental declarations.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: January 19, 2024

/s/ Deborah Kovsky-Apap

Deborah Kovsky-Apap, Esq.

CERTIFICATE OF SERVICE

I, Tori L. Remington, hereby certify that on January __, 2024, I caused the foregoing *Second Supplemental Declaration of Deborah Kovsky-Apap in Support of Application for Entry of an Order Authorizing the Employment and Retention of Troutman Pepper Hamilton Sanders LLP as Counsel to the Official Committee of Unsecured Creditors Effective as of July 17, 2023* to be served upon the parties set forth on the attached service list in the manner indicated, and all ECF participants registered in these cases were served electronically on the date of filing through the Court's ECF system at their respective email addresses registered with the Court.

/s/ Tori L. Remington

Tori L. Remington (DE No. 6901)